

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES  
VALLELLANES,  
Plaintiff,**

**v.**

**JOHN POTTER, UNITED STATES  
POSTMASTER GENERAL, ET ALS.,  
Defendants.**

**CIVIL NO. 97-2459 (JAG)**

**DAMAGES BASED ON  
RETALIATION AND  
DISCRIMINATION; PROHIBITED  
PERSONNEL PRACTICES;  
UNFAIR LABOR PRACTICES;  
BREACH OF COLLECTIVE  
BARGAINING AGREEMENT**

**TRIAL BY JURY IS HEREBY  
REQUESTED**

**SECOND MOTION TO AMEND PLAINTIFF PROSPECTIVE  
WITNESSES INCLUDED IN THE JOINT DISCOVERY SCHEDULE**

**COMES NOW**, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. On January 23, 2004 the parties in the above captioned case filed a Joint Discovery Schedule.
2. Paragraph 3 of said document stated the following:

“3. The above list of witnesses for both parties is not final as it can be increased or reduced as a result of the discovery.”
3. Plaintiff respectfully request to include the following prospective witnesses:

Vicente Feliciano (Economic expert witness)

Guillermo Hoyos (Psychiatric expert witness)

Carmelo Martínez

4. Plaintiff hereby withdraws Juan Rodríguez from his witness list.

**WHEREFORE**, it is respectfully requested from this Honorable Court to authorize Plaintiff to amend the Joint Discovery Schedule as to include said Plaintiff list of prospective witnesses.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on April 26, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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